

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CASE NO. 04-CV-12137 JLT

**SUZANNE GENEREUX and BARRY
GENEREUX, Individually and as Parents
And Natural Guardians of their minor
children, ANGELA GENEREUX and
KRISTA GENEREUX,
Plaintiffs**

v.

**AMERICAN BERYLLIA CORP., BRUSH
WELLMAN, INC., BRUSH WELLMAN
CERAMICS, INC., BRUSH WELLMAN
CERAMIC PRODUCTS, INC., HARDRIC
LABORATORIES, INC., KYOCERA
AMERICA, INC., KYOCERA INDUSTRIAL
CERAMICS CORP., and RAYTHEON
COMPANY,
Defendants**

DESIGNATION OF EXPERTS BY DEFENDANT, AMERICAN BERYLLIA, INC.

American Beryllia, Inc. was not in existence during the time of Suzanne Genereux's alleged exposure to beryllium products. It is American Beryllia, Inc.'s contention that it is not a successor of General Ceramics, Inc., a beryllium manufacturer which was in existence during the period of the alleged exposure. On October 30, 2006, American Beryllia, Inc. filed and served its Motion for Summary Judgment. In an abundance of caution, the defendant, American Beryllia, Inc., hereby makes its expert disclosure as follows:

1. Lawrence Repsher, M.D.
3555 Lutheran Parkway, #330
Wheatridge, CO 80033
2. Jonathan Borack, M.D., DABT
234 Church St., Suite 1100
New Haven, CT 06510-1804

3. Richard P. Garrison, Ph.D., CIH, CSP
Garrison Industrial Health, LLC
1645 Northbrook Dr.
Ann Arbor, MI 48103
4. Gerald M. Goldhaber, Ph.D.
Goldhaber Research Associates, LLC
1525 Amherst Manor Dr., #907
Williamsville, NY 14221

The defendant, American Beryllia, Inc., hereby incorporates by reference the written reports and accompanying materials filed by the co-defendant, Brush Wellman, Inc., in connection with the above-listed witnesses.

American Beryllia, Inc. respectfully reserves the right to supplement its expert disclosure, if necessary, depending upon the Court's decision on the summary judgment motion.

Respectfully submitted,

CLARK, HUNT & EMBRY

/s/ William F. Ahern, Jr.

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